

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
WACO DIVISION**

K.MIZRA LLC,

Plaintiff,

v.

CISCO SYSTEMS, INC.,

Defendant.

Civil Action No. 6:20-cv-01031-ADA

Jury Trial Demanded

JOINT NOTICE OF SIXTH PROPOSED AMENDMENT OF SCHEDULING ORDER

Plaintiff K.Mizra LLC and Defendant Cisco Systems, Inc. (collectively, "the Parties") respectfully submit this notice of their sixth proposed amendment of certain dates set forth in the Parties' Joint Motion For Entry Of Fifth Proposed Amendment of Scheduling Order filed July 10, 2023 (ECF No. 172) and in the Court's Fifth Amended Scheduling Order (ECF No. 173).

The Parties note that the current dates for the joint pretrial order and pretrial submissions, the final pretrial conference, and trial (*see* ECF Nos. 172, 173, 201, and 202) will not be affected by the Parties' proposed amended schedule. For the Court's convenience, a comparison of the current dates and the Parties' proposed dates are set forth in the following chart:

Event	Former / Current Deadline	Parties' Proposed Date
Further Supplement to Pellegrino Report due.		April 30, 2024
Parties to meet and confer regarding objections to Further Supplement to Pellegrino Report or to confirm consent to service.		May 1, 2024
Further Supplement to Salters Report due.		May 14, 2024

Event	Former / Current Deadline	Parties' Proposed Date
Parties to meet and confer regarding objections to Further Supplement to Salters Report or to confirm consent to service.		May 15, 2024
Deposition of M. Pellegrino (2 hours).		May 16, 2024
Serve Pretrial Disclosures (jury instructions, exhibit lists, witness lists, discovery, and deposition designations).	June 16, 2023	May 30, 2024
Deposition of A. Salters.		May 31, 2024
<i>Daubert</i> motion deadline.	June 9, 2023	June 7, 2024
<i>File motions in limine.</i>	July 14, 2023	June 7, 2024
Parties to jointly email the Court's law clerk to confirm pretrial conference and trial dates		June 10, 2024
Serve objections to Pretrial Disclosures. Serve Rebuttal Disclosures.	June 30, 2023	June 14, 2024
<i>Deadline to file Response to Daubert motions.</i>	June 23, 2023	June 20, 2024
<i>File oppositions to motions in limine.</i>	May 13, 2024	June 20, 2024
<i>Serve objections to Rebuttal Disclosures.</i>	May 6, 2024	June 20, 2024
<i>Deadline to file Replies to Responses to Daubert motions.</i>	June 30, 2023	June 24, 2024
<i>File reply briefs to motions in limine.</i>	May 20, 2024	June 24, 2024
File Joint Pretrial Order and Pretrial Submissions (jury instructions, exhibit lists, witness lists, discovery and deposition designations, proposed questions for voir dire examination).	July 14, 2023	June 25, 2024
<i>File Joint Notice identifying remaining objections to pretrial disclosures and disputes on motions in limine.</i>	May 31, 2024	June 27, 2024
<i>Parties to file any objections to the Proposed Jury Charge shall be filed as directed in the scheduling order.</i>		July 1, 2024

Event	Former / Current Deadline	Parties' Proposed Date
Deadline to meet and confer regarding remaining objections and disputes on motions in <i>limine</i> .	May 27, 2024	July 1, 2024
Final Pretrial Conference.	July 2, 2024 at 9:00 a.m. Central via Zoom	No Change
Jury Selection/Trial.	August 5, 2024	No Change

Accordingly, the Parties respectfully request that the Court enter the Amended Scheduling Order as set forth in the above chart.

Dated: April 24, 2024

Respectfully submitted,

By: /s/ Paul S. Cha

Michael C. Smith
Texas Bar No. 18650410
michael.smith@solidcounsel.com
Scheef & Stone, LLP
113 E. Austin Street
Marshall, TX 75670
(903) 938-8900

Robert R. Brunelli*
CO State Bar No. 20070
rbrunelli@sheridanross.com
Paul Sung Cha*
CO State Bar No. 34811
pscha@sheridanross.com
Bart A. Starr*
CO State Bar No. 50446
bstarr@sheridanross.com
Angela J. Bubis*
CO State Bar No. 58144
abubis@sheridanross.com
SHERIDAN ROSS P.C.
1560 Broadway, Suite 1200
Denver, CO 80202
Telephone: 303-863-9700
Facsimile: 303-863-0223
litigation@sheridanross.com

*Admitted pro hac vice
Attorneys for Plaintiff K.Mizra LLC

By: /s/ Melissa Smith

Elizabeth Rogers Brannen
Kenneth J. Halpern
Sarah Rahimi
Stris & Maher LLP
777 South Figueroa Street, Suite 3850
Los Angeles, CA 90017
Telephone: (213) 995-6809
Fax: (213) 261-0299
Email: ebrannen@stris.com
khalpern@stris.com
srahimi@stris.com

Melissa Richards Smith
Gillam and Smith, LLP
303 South Washington Avenue
Marshall, TX 75670
Telephone: (903) 934-8450
Fax: (903) 934-9257
Email: melissa@gillamsmithlaw.com

James Travis Underwood
Gillam & Smith, LLP
102 N. College, Suite 800
Tyler, TX 75702
Telephone: (903) 934-8450
Fax: (903) 934-9257
Email: travis@gillamsmithlaw.com

Attorneys for Defendant
Cisco Systems, Inc.

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the above and foregoing document has been served on April 24, 2024, to all counsel of record who are deemed to have consented to electronic service via the Court's CM/ECF system.

/s/ Paul S. Cha
Paul Sung Cha*
CO State Bar No. 34811
pscha@sheridanross.com
SHERIDAN ROSS P.C.
1560 Broadway, Suite 1200
Denver, CO 80202
Telephone: 303-863-9700
Facsimile: 303-863-0223
litigation@sheridanross.com

**Admitted pro hac vice
Attorney for Plaintiff K.Mizra LLC*